

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

MICHAEL MERRILL, *et al.*,)
Plaintiffs,) Case No. 10-C-700-LA
v.) Honorable Lynn Adelman
BRIGGS & STRATTON CORPORATION, *et al.*,)
Defendants.)

DECLARATION OF ABBEY M. GLENN

I, Abbey M. Glenn, declare as follows:

1. I am an attorney at the law firm of Morgan, Lewis & Bockius LLP (“Morgan Lewis”), attorneys for defendants Briggs & Stratton Corporation and the Group Insurance Plan of Briggs & Stratton Corporation (collectively, “Defendants”). In my capacity as an attorney with responsibility for managing the defense of this litigation, I have personal knowledge of the factual information stated in this declaration and, if called as a witness, I could and would testify competently thereto.

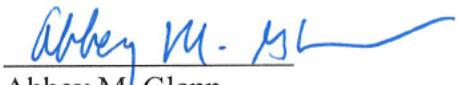
2. In accordance with the Court’s Order Preliminarily Approving Class Settlement (Dkt. No. 187) and 28 U.S.C. § 1715, on April 22, 2016, on behalf of Defendants, Morgan Lewis mailed via Federal Express notice of the parties’ proposed settlement to the Attorney General of the United States and the Attorneys General of the states in which a class member resides according to data received on or about April 14, 2016 from Briggs & Stratton Corporation: Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nevada, North Carolina, Tennessee, Texas, Utah, Washington, and Wisconsin (the “Notices”).

3. The Notices included a CD containing copies of the Complaint and exhibits thereto, the Supplemental and Corrected Complaint and exhibits thereto, the notice of class action settlement disseminated to class members, the Stipulation of Settlement, and the names of class members believed to be residing in each state who are expected to receive proceeds from the settlement.

4. The Notices also provided instructions for accessing, via Pacer, details regarding the final fairness hearing regarding the settlement, the final judgment or notice of dismissal, and any written judicial opinion relating to the settlement.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on July 20, 2016.


Abbey M. Glenn